

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

STATE OF TEXAS; STATE OF  
LOUISIANA,

*Plaintiffs,*

v.

The UNITED STATES OF AMERICA;  
ALEJANDRO MAYORKAS, Secretary  
of the United States Department of  
Homeland Security, in his official  
capacity; UNITED STATES  
DEPARTMENT OF HOMELAND  
SECURITY; TROY MILLER, Senior  
Official Performing the Duties of the  
Commissioner of U.S. Customs and  
Border Protection, in his official  
capacity; U.S. CUSTOMS AND  
BORDER PROTECTION; TAE  
JOHNSON, Acting Director of U.S.  
Immigration and Customs  
Enforcement, in his official capacity;  
U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT; TRACY RENAUD,  
Senior Official Performing the Duties of  
the Director of the U.S. Citizenship and  
Immigration Services, in her official  
capacity; U.S. CITIZENSHIP AND  
IMMIGRATION SERVICES,

*Defendants.*

Civ. Action No. 6:21-cv-16

**ADVISORY REGARDING ATTORNEY AVAILABILITY FOR DECEMBER 8  
SCHEDULING CONFERENCE**

The Court has noticed a scheduling conference for December 8, 2021 at 2 p.m., and Plaintiffs advise that Ryan D. Walters, the attorney who has been most heavily involved in the recent phases of this litigation (involving the motion for extra-record discovery and the motion to postpone the effective date of agency action) has a conflict with that setting.

Mr. Walters is the attorney-in-charge for a coalition of 23 States in *Texas v. Biden*, No. 3:21-cv-65 (S.D. Tex.) (Brown, J.). A hearing on a motion to dismiss is scheduled in that matter for December 8, 2021 at 2 p.m. in Galveston. *See* Exhibit A. Mr. Walters will be attending that hearing in person.

Plaintiffs provide this information solely for consideration of what would most benefit the Court for this conference. Plaintiffs are happy to have other attorneys involved in this matter participate in the conference at the scheduled time. However, if the Court would find it more helpful for the attorney with the most involvement in the pending matters to participate, Plaintiffs respectfully request that the conference be moved to a time that Mr. Walters is available—either 12 noon on December 8, or any other time on December 6, 7, 9, or 10.

Date: December 3, 2021

Ken Paxton  
Attorney General of Texas

Brent Webster  
First Assistant Attorney General

Judd E. Stone II  
Solicitor General

Respectfully submitted,

Patrick K. Sweeten  
Deputy Attorney General for Special  
Litigation  
*Attorney-in-Charge*  
Texas Bar No. 00798537  
Southern District of Texas Bar No. 1829509

WILLIAM T. THOMPSON  
Deputy Chief, Special Litigation Unit  
Texas Bar No. 24088531  
Southern District of Texas Bar No. 3053077

/s/ Ryan D. Walters  
RYAN D. WALTERS  
Special Counsel, Special Litigation Unit  
Texas Bar No. 24105085  
Southern District of Texas Bar No. 3369185

OFFICE OF THE ATTORNEY GENERAL  
SPECIAL LITIGATION UNIT  
P.O. Box 12548 (MC-009)  
Austin, Texas 78711-2548  
Tel.: (512) 936-1414  
Fax: (512) 936-0545  
patrick.sweeten@oag.texas.gov  
will.thompson@oag.texas.gov  
ryan.walters@oag.texas.gov

**COUNSEL FOR PLAINTIFF STATE OF TEXAS**

JEFF LANDRY  
Louisiana Attorney General

/s/Elizabeth B. Murrill  
ELIZABETH B. MURRILL  
Solicitor General

JOSEPH F. ST. JOHN  
Deputy Solicitor General

LOUISIANA DEPARTMENT OF JUSTICE  
1885 N. Third St.  
Baton Rouge, LA 70804  
(225) 326-6766  
murrille@ag.louisiana.gov  
stjohnj@ag.louisiana.gov

**COUNSEL FOR PLAINTIFF STATE OF  
LOUISIANA**

**CERTIFICATE OF WORD COUNT**

I certify that the total number of words in this document, exclusive of those sections designated for omission, is 204 as registered by Microsoft Word.

/s/Ryan D. Walters  
RYAN D. WALTERS

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on December 3, 2021, which automatically serves all counsel of record who are registered to receive notices in this case.

/s/Ryan D. Walters  
RYAN D. WALTERS